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*ADMITTED IN DC ONLY

October 22, 2018

Re: Deutsche Bank Trust Company Americas v. Rado Limited
Partnership, Case No. 1:18-cv-06768 (DLC)

Dear Judge Cote:

We represent Plaintiff Deutsche Bank Trust Company Americas ("DBTCA") in the above-referenced action and write pursuant to Part 4.C of the Court's Individual Practices in Civil Cases to set forth DBTCA's basis for its belief that diversity of citizenship exists in this matter pursuant to 28 U.S.C. § 1332.

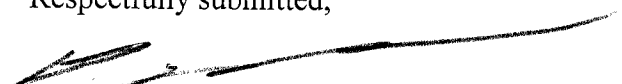
Plaintiff DBTCA is a corporation incorporated under the laws of New York with its principal place of business at 60 Wall Street, New York, New York 10005. Plaintiff is a citizen of the State of New York. *See* 28 U.S.C. § 1332(c).

Defendant Rado Limited Partnership ("Rado") is a limited partnership established under the laws of New Zealand, with its principal place of business at Amicorp New Zealand Limited, West Size, Level 3, The Ferry Building, 99 Quay Street, Auckland 1010 New Zealand. Rado is a citizen of a foreign state.

This is an action between a citizen of a State and a citizen of a foreign state. *See* 28 U.S.C. § 1332(a)(2). The amount in controversy exceeds \$75,000, exclusive of interest and costs, as the Complaint seeks contractual damages of no less than \$2,557,267.72.

We also note that in its Answer filed September 12, 2018 (Docket No. 20), at ¶¶ 9-13, Rado admitted DBTCA's jurisdictional allegations.

Respectfully submitted,



David G. Januszewski

CAHILL GORDON & REINDEL LLP

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The Honorable Denise L. Cote
United States District Judge
United States District Court
500 Pearl Street, Room 1910
New York, New York 10007-1312

BY ECF

cc: Jenice L. Malecki, Esq. (Counsel for Defendant)